

EXHIBIT 25

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005
City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132
The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

Videotaped Deposition of Joseph Rannazzisi
Washington, D.C.
April 26, 2019
8:37 a.m.

Reported by: Bonnie L. Russo
Job No. 3301876

1 data.

2 BY MR. EPPICH:

3 Q. And using ARCOS, DEA monitors the
4 flow of DEA-controlled substances from their
5 point of manufacture through commercial
6 distribution channels to point of sale or
7 distribution to the dispensing retail level?

8 MS. SINGER: Objection. Foundation.

9 MR. BENNETT: Objection. Vague.

10 THE WITNESS: DEA can use that
11 system to monitor transactions downstream.

12 BY MR. EPPICH:

13 Q. And that's downstream from the
14 manufacturers all the way to the retail level,
15 correct?

16 A. Yes. I believe so.

17 SPECIAL MASTER COHEN: Just a
18 minute, please.

19 We're still hearing folks on the
20 phone. If you are on the phone, please mute
21 yourself.

22 BY MR. EPPICH:

23 Q. So, Mr. Rannazzisi, using ARCOS, DEA
24 can see the number of opioids sold by
25 manufacturers to distributors?

1 A. Yes.

2 Q. And using ARCOS, DEA can see the
3 number of opioids distributed by distributors
4 to pharmacies, hospitals and doctors?

5 A. Yes.

6 Q. Registrants did not have access to
7 ARCOS data during your -- the time you led the
8 Office of Diversion Control, correct?

9 A. They had access to their own data
10 that they submitted to ARCOS. But no, not
11 other.

12 Q. So registered --

13 A. From the ARCOS.

14 Q. Pardon me.

15 Registrants had no access to the
16 ARCOS database, correct?

17 A. Except for their own entries, yes.

18 Q. Their own entries that's they
19 submitted?

20 A. Yes, that they submitted.

21 Q. But they couldn't access those
22 entries through the ARCOS database, could they?

23 A. I'm not sure about that.

24 Q. There was no portal that you were
25 aware of that a registrant could log into to

1 Q. So if a diversion investigator is
2 going to make it all the way to become a SAC,
3 at some point that diversion investigator is
4 going to need to become a special agent, right?

5 A. Yes.

6 Q. Okay.

7 MS. SINGER: Objection. Compound
8 question.

9 BY MR. STEPHENS:

10 Q. So is it fair to say then that one
11 of your challenges as deputy administrator was
12 trying to get special agents in charge in the
13 various field divisions to prioritize diversion
14 matters on equal footing with enforcement
15 investigation?

16 MS. SINGER: Objection. Compound
17 question. Lack of foundation. And vague.

18 MR. BENNETT: Objection. Vague.
19 Objection. Scope.

20 THE WITNESS: The field divisions
21 are -- they operate autonomously. So the
22 special agent in charge decides what the
23 priorities field divisions are and their field
24 management plans and just what their senior
25 leadership in the division -- they make that

1 decision.

2 So -- but I've never really had
3 problems with the field divisions not
4 addressing diversion issues, no.

5 Q. So the special agent in charge would
6 have some authority as to setting his or her
7 priorities on the investigations that they were
8 going to pursue; is that fair?

9 A. Yes.

10 Q. Let me just get the terminology
11 right.

12 A RAC runs a resident office, right?

13 A. Yes.

14 Q. Okay. Would you expect that a RAC
15 who is running a resident office in 2015 would
16 be familiar with a suspicious order report?

17 MR. BENNETT: Objection. Scope.
18 Calls for speculation.

19 THE WITNESS: I would have no idea
20 what each individual RAC knows. But I do know
21 that it -- most RACs, most special agents in
22 charge, and most, yeah, ASACs, assistant
23 special agents in charge, when they have
24 questions or they want to know the answer to a
25 diversion question, they will go to their --